

**UNREDACTED VERSION OF
DOCUMENT SOUGHT TO BE SEALED**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master Case No.: 3:07-cv-05944-SC
MDL No. 1917
Individual Case Nos. 3:11-cv-05513-SC;
3:11-cv-06396-SC

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Target Corp. v. Chunghwa, et al.,
No. 11-cv-05514-SC*

*Tech Data v. Hitachi, Ltd., et al.
No. 13-cv-00157-SC*

**DECLARATION OF VINCENT S. LOH
IN SUPPORT OF PLAINTIFFS BEST
BUY, TARGET, AND TECH DATA'S
CONSOLIDATED OPPOSITION TO
DEFENDANT BEIJING MATSUSHITA
COLOR CRT CO., LTD.'S MOTION
TO DISMISS CERTAIN DIRECT
ACTION PURCHASER COMPLAINTS**

[Plaintiffs Best Buy, Target, and Tech
Data's Consolidated Opposition To
Defendant Beijing Matsushita Color CRT
Co., Ltd.'s Motion To Dismiss Certain
Direct Action Purchaser Complaints filed
Concurrently Herewith]

Date: January 24, 2014
Time: 10:00 a.m.
Before the Honorable Samuel Conti

1 I, VINCENT S. LOH, declare as follows:

2 1. I am a duly licensed attorney admitted to practice in the State of California and
3 before this Court. I am an associate in the law firm of Robins, Kaplan, Miller & Ciresi L.L.P. in
4 Los Angeles, California, counsel for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing, LLC,
5 Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com and Magnolia Hi-Fi, LLC
6 (collectively, "Best Buy") in this action. Each of the facts stated herein is true and correct within
7 my personal knowledge, and if called as a witness, I would competently testify thereto.

8 2. I submit this declaration in support of Plaintiffs Best Buy, Target Corp., Tech Data
9 Corporation, and Tech Data Product Management, Inc. (collectively, "Plaintiffs") Opposition to
10 Defendant Beijing Matsushita Color CRT Co., Ltd.'s ("BMCC") Motion to Dismiss Certain
11 Direct Action Purchaser Complaints.

12 3. Attached hereto as Exhibit A is a true and correct copy of BMCC's Supplemental
13 Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories. **FILED**
14 **UNDER SEAL.**

15 4. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
16 deposition of Ayumu Kinoshita, taken on February 5 and 6, 2013 in San Francisco, California.
17 **FILED UNDER SEAL.**

18 5. Attached hereto as Exhibit C is a true and correct copy of BMCC's Initial
19 Disclosure Statement.

20 6. Attached hereto as Exhibit D is a true and correct copy of a document produced by
21 Matsushita Toshiba Picture Display Co., Ltd ("MTPD"), bates labeled MTPD-0263200. **FILED**
22 **UNDER SEAL.**

23 7. Attached hereto as Exhibit E is a true and correct copy of Samsung SDI
24 Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories,
25 Nos. 4 and 5. **FILED UNDER SEAL.**

26 8. Attached hereto as Exhibit F is a true and correct copy of excerpts from the
27 deposition of Sheng-Jen Yang, taken on February 26, 2013 in Taipei City, Taiwan. **FILED**
28 **UNDER SEAL.**

9. Attached hereto as Exhibit G is a true and correct copy of excerpts from the deposition of Jing Song Lu, taken on February 28, 2013 in Taipei City, Taiwan. **FILED UNDER SEAL.**

10. Attached hereto as Exhibit H is a true and correct copy of deposition exhibit no. 1108e from the February 19, 2013 deposition of Chih Chun-Liu, bates labeled CHU00029191E to CHU00029194E. **FILED UNDER SEAL.**

11. Attached hereto as Exhibit I is a true and correct copy of deposition exhibit no. 1252e from the February 22, 2013 deposition of Sheng-Jen Yang, bates labeled CHU00029179E to CHU00029184E. **FILED UNDER SEAL.**

12. Attached hereto as Exhibit J is a true and correct copy of deposition exhibit no. 1231e from the February 21, 2013 deposition of Chih Chun-Liu, bates labeled CHU00028441.01E to CHU00028446E. **FILED UNDER SEAL.**

13. Attached hereto as Exhibit K is a true and correct copy of excerpts from the deposition of Chih Chun-Liu, taken on February 21, 2013 in Taipei City, Taiwan. **FILED UNDER SEAL.**

14. Attached hereto as Exhibit L is a true and correct copy of deposition exhibit no. 253 from the July 13, 2012 deposition of Takashi Nakano, bates labeled MTPD-0201555 to MTPD-0201556. **FILED UNDER SEAL.**

15. Attached hereto as Exhibit M is a true and correct copy of a document produced by BMCC, bates labeled BMCC-CRT000296247. **FILED UNDER SEAL.**

16. Attached hereto as Exhibit N is a true and correct copy of deposition exhibit no. 1427e from the February 7, 2013 deposition of Hirokazu Nishiyama, bates labeled MTPD-0335675 to MTPD-0335678. **FILED UNDER SEAL.**

17. Attached hereto as Exhibit O is a true and correct copy of document produced by BMCC, bates labeled BMCC-CRT000124448 to BMCC-CRT000124455. **FILED UNDER SEAL.**

18. Attached hereto as Exhibit P is a true and correct copy of deposition exhibit no. 804 from the February 5, 2013 deposition of Ayumu Kinoshita, bates labeled MTPD-0223553 to

1 MTPD-0223554. **FILED UNDER SEAL.**

2 19. Attached hereto as Exhibit Q is a true and correct copy of deposition exhibit no.
3 809 from the February 6, 2013 deposition of Ayumu Kinoshita, bates labeled MTPD-0141811 to
4 MTPD-0141812. **FILED UNDER SEAL.**

5 20. Attached hereto as Exhibit R is a true and correct copy of a document produced by
6 BMCC, bates labeled BMCC-CRT000001186. **FILED UNDER SEAL.**

7 21. Attached hereto as Exhibit S is a true and correct copy of a document produced by
8 BMCC, bates labeled BMCC-CRT000073042 to BMCC-CRT000073044. **FILED UNDER**
9 **SEAL.**

10 22. Attached hereto as Exhibit T is a true and correct copy of a document produced by
11 BMCC, bates labeled BMCC-CRT000115766 to BMCC-CRT000115767. **FILED UNDER**
12 **SEAL.**

13 23. Attached hereto as Exhibit U is a true and correct copy of a document produced by
14 BMCC, bates labeled BMCC-CRT000120243. **FILED UNDER SEAL.**

15 24. Attached hereto as Exhibit V is a true and correct copy of a document produced by
16 BMCC, bates labeled BMCC-CRT000120244. **FILED UNDER SEAL.**

17 25. Attached hereto as Exhibit W is a true and correct copy of a document produced
18 by BMCC, bates labeled BMCC-CRT000120246 to BMCC-CRT000120247. **FILED UNDER**
19 **SEAL.**

20 26. Attached hereto as Exhibit X is a true and correct copy of a document produced by
21 BMCC, bates labeled BMCC-CRT000120248 to BMCC-CRT000120256. **FILED UNDER**
22 **SEAL.**

23 27. Attached hereto as Exhibit Y is a true and correct copy of a document produced by
24 BMCC, bates labeled BMCC-CRT000125601 to BMCC-CRT000125603. **FILED UNDER**
25 **SEAL.**

26 28. Attached hereto as Exhibit Z is a true and correct copy of a document produced by
27 BMCC, bates labeled BMCC-CRT000087322 to BMCC-CRT000087329. **FILED UNDER**
28 **SEAL.**

29. Attached hereto as Exhibit AA is a true and correct copy of William S. Comanor's Corrected Declaration in Support of Plaintiffs' Opposition to BMCC's Motion to Quash Service of Summons, filed by the State of California on December 5, 2013 in the litigation entitled *The People of the State of California, et al. v. Samsung SDI, Co., Ltd., et al.* (San Francisco Superior Court Case No. CGC-11-515784).

30. Attached hereto as Exhibit BB is a true and correct copy of a document produced by BMCC, bates label range BMCC-CRT000123772 to BMCC-CRT000123777. **FILED UNDER SEAL.**

31. Attached hereto as Exhibit CC is a true and correct copy of excerpts from the deposition of Jae In Lee, taken on June 7, 2012 in San Francisco California. **FILED UNDER SEAL.**

32. BMCC has produced documents in connection with this *CRT* MDL litigation on four separate occasions: June 17, 2010, September 24, 2010, September 20, 2011, and November 9, 2011. BMCC's total production to date is approximately 598,953 pages of documents.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed this 17th day of January, 2014, at Los Angeles, California.

/s/ Vincent S. Loh
Vincent S. Loh